

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL No. 16-2738 (MAS) (RLS)

*THIS DOCUMENT RELATES TO ALL CASES*

**THE PLAINTIFFS' STEERING COMMITTEE'S MOTION TO QUASH OR FOR  
PROTECTIVE ORDER REGARDING SUBPOENA DIRECTED AT KCIC, LLC**

PLEASE TAKE NOTICE that, at 9:00 a.m. on February 5, 2024, or at such other time as set by the Court, Plaintiffs, by and through the Plaintiffs' Steering Committee (PSC), will Move to Quash or for Protective Order Regarding Subpoena Directed at KCIC, LLC.

As fully discussed in Plaintiffs' Memorandum of Law in Support of this Motion, the Court should quash, or in the alternative issue a protective order, regarding Johnson & Johnson's subpoena to KCIC, LLC because it seeks confidential, privileged communications that occurred in the LTL bankruptcy proceeding. The subpoenaed information is also irrelevant and inadmissible in the MDL.

Plaintiffs respectfully request that the Court grant the Motion to Quash or For Protective Order Regarding Subpoena Directed at KCIC, LLC. A proposed order is attached for the Court's consideration.

Dated: January 12, 2024

Respectfully submitted,

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***Plaintiffs' Liaison Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ Michelle A. Parfitt  
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